

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**PLAINTIFFS' NOTICE OF MOTION TO EXCLUDE THE DECLARATIONS OF
BENJAMIN COTTON**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD.

PLEASE TAKE NOTICE that on January 28, 2025 at 11:00 a.m. in Courtroom 3A, 316 N. Robert Street, Saint Paul, Minnesota before the Honorable Judge Jeffrey M. Bryan of the above-referenced United States District Court, Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited will bring their Motion to Exclude the Declarations of Benjamin Cotton.

Dated: January 10, 2025

Respectfully submitted,

/s/ Timothy M. Frey

Christopher K. Larus
Minnesota Bar No. 0226828
CLarus@robinskaplan.com
William E. Manske

Minnesota Bar No. 0392348
WManske@robinskaplan.com
Emily J. Tremblay
Minnesota Bar No. 0395003
ETremblay@robinskaplan.com
ROBINS KAPLAN LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Telephone: (612) 349-8500

J. Erik Connolly (admitted *pro hac vice*)
EConnolly@beneschlaw.com
Illinois ARDC No. 6269558
Nicole E. Wrigley (admitted *pro hac vice*)
NWrigley@beneschlaw.com
Illinois ARDC No. 6278749
Timothy M. Frey (admitted *pro hac vice*)
TFrey@beneschlaw.com
Illinois ARDC No. 6303335
Julie M. Loftus (admitted *pro hac vice*)
JLoftus@beneschlaw.com
Illinois ARDC No. 6332174
**BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP**
71 South Wacker Drive, Suite 1600
Chicago, IL 60606
Telephone: (312) 212-4949

James R. Bedell (admitted *pro hac vice*)
JBedell@beneschlaw.com
Ohio Bar No. 97921
**BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP**
127 Public Square, Suite 4900
Cleveland, OH 44114
Telephone: (216) 363-4500

Attorneys for the Plaintiffs